



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



269604

SEP 8 2005

REPLY TO THE ATTENTION OF.

By Certified Mail
Return Receipt Requested

C-14J
RRG/Clayton Chemical Site

RRG/Clayton Chemical Co. Superfund Site PRP Group

Privileged and Confidential

RE: RRG/Clayton Chemical Superfund Site (soils) [1 Mobile Avenue, Sauget, IL, St. Clair County] Potential Noncooperating Large PRP Group

Dear Sir or Madam:

The United States Environmental Protection Agency (US EPA) is in receipt of the RRG/Clayton Chemical Co. PRP Group (soils removal) notification of you as a party identified in the initial US EPA General Notice letter of November 22, 2004. The PRP group that is going forward with a soils removal under a US EPA CERCLA Administrative Settlement AOC (AS AOC) has notified us that you are not willing to aid in the clean up.

Please be aware that US EPA has committed to working with the PRP group, upon receipt of signature pages and issuance of the abovementioned AS AOC, to issue Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) 106 unilateral administrative orders for participation and coordination in hazardous soils clean up activities at the abovementioned site to all viable and liable noncooperating parties that meet the requirements of the specific CERCLA statute.

US EPA contemplates a settlement and issuance of the AS AOC by or before approximately September 30, 2005.

Please contact me with any questions or comments by e-mail (Turner.Thomas@epa.gov) or at 312/886-6613.

Sincerely yours,

Tom Turner
Staff Attorney
US EPA, ORC, Region 5

Name of Company	Volumetric Share	% of all above 75,000 gal	Anticipate Participation?
Sigma-Aldrich Corporation	979,617	5.24%	No (Recalcitrant)
Bliss Waste Oil Company	900,047	4.81%	No (Out of Business)
A-1 Oil Corporation	759,597	4.06%	No (Out of Business)
Superior Equipment Co	513,175	2.74%	No (Ability to Pay Issues)
Plastic Products Co., Inc. (Purethane)	463,210	2.48%	No (Challenges Successor Liability)
Boben Manufacturing Company	283,855	1.52%	No (Dissolved)
AAD Distribution & Dry Cleaning Services, Inc.	267,637	1.43%	No (Incarcerated)
North East Recycling Transportation, Inc.	262,207	1.40%	No (Bankrupt)
Diosynth, Inc.	222,653	1.19%	No (Recalcitrant)
Monsanto Company (now known as Pharmacia)	208,803	1.12%	No (Recalcitrant)
Central Illinois Public Service Company (Ameren CIPS)	167,573	0.90%	No (Recalcitrant)
Lyon Metal Products, LLC	161,625	0.86%	No (Recalcitrant)

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Universal Packaging Corporation	144,690	0.77%	No (Incorrect Company Served)
Titan Wheel Corporation of Illinois	141,420	0.76%	Non-Responsive
Silgan Containers Corp.	136,154	0.73%	No (Challenges Notice)
Safety-Kleen Systems, Inc. (Tricil)	135,980	0.73%	No (Bankrupt)
ACME Printing	134,821	0.72%	No (No Notice Letter Sent)
Keystone Consolidated Industries, Inc.	128,603	0.69%	No (Bankrupt)
Bemis Company, Inc.	114,370	0.61%	Considering
Steelcote Manufacturing Company	112,145	0.60%	No (Challenges Successor Liability)
Borden Decorative Prod.	103,178	0.55%	No (No Notice Letter Sent)
Don V. Davis Company	99,956	0.53%	No (No Notice Letter Sent)
Curwood, Inc.	98,710	0.53%	Considering
Kansas City Southern Railway Company	94,145	0.50%	No (Wrong Party Notified)
Safety-Kleen (TS) Inc. (Laidlaw)	92,948	0.50%	No (Bankrupt)
Lyon Workspace Products, LLC	89,190	0.48%	No (Recalcitrant)
Container Prod.	85,577	0.46%	No (No Notice Letter Sent)

Allied Healthcare Products, Inc.	83,614	0.45%	No (Challenges Allocation)
Futura Coatings	75,776	0.41%	No (No Notice Letter Sent)
Archer Daniels Midland Company			No (No Notice Letter Sent)
DJR Holdings, Inc.			No (Dissolved)
Imperial Home Decor Group, Inc.			No (Bankrupt)
TOTAL	7,061,276	37.76%	